IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID AND PAMELA JACKSON

Plaintiffs, : Civil Action No.: 09-cy-1549-

: MAM

:

REAL ESTATE MORTGAGE NETWORK,

INC., et al.

v.

:

Defendants.

MOTION OF DEFENDANT REAL ESTATE MORTGAGE NETWORK, INC. TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT

Defendant Real Estate Mortgage Network, Inc. ("REMN") moves pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss Count II (Credit Services Act), Count III (Unfair Trade Practices and Consumer Protection Law), and Count IV (Fraud/Fraudulent Misrepresentation) of the Second Amended Complaint against REMN, and in support of this Motion incorporates the accompanying Memorandum of Law with exhibits by reference.

Respectfully submitted,

/s/ Lance S. Forbes
Lance S. Forbes, Esquire
The Law Office of Lance S. Forbes, LLC
112 Center Street
Moorestown, New Jersey 08057
(856) 793-7133
Attorney for Defendant Real Estate Mortgage
Network, Inc.

Dated: May 10, 2010